

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**CONSTANCE COLEMAN,**

Plaintiff,

v.

**BVLGARI CORPORATION OF  
AMERICA,**

Defendant.

No. 08cv1959

Judge Ruben Castillo  
Magistrate Judge Maria Valdez

**PARTIES' JOINT STATUS REPORT**

1. Pursuant to Fed.R.Civ.P. 26(f) and Local Rule 26.1, Plaintiff's counsel, Armand L. Andry, and Defendant's counsel, Asilia S. Backus, corresponded via email on May 30, 2008.

2. Pre-Discovery Disclosures. The parties will exchange by June 13, 2008 the information required by Fed.R.Civ.P. 26(a)(1) and Local Rule 26.1.

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: Plaintiff's race and age discrimination and retaliation claims and Defendant's defenses to Plaintiff's claims.

All discovery commenced in time to be completed by October 15, 2008.

Maximum of 25 interrogatories by each party to any other party.

Maximum of 25 requests for admission by each party to any other party.

Maximum of 5 depositions by Plaintiff and 5 by Defendant. Each deposition limited to a maximum of 7 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

From Plaintiff by August 29, 2008;

From Defendant by September 30, 2008.

Supplementations under Rule 26(e) due within 30 days after a party receives the information or documentation.

4. Other Items.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in April 2009.

Plaintiff should be allowed until June 30, 2008 to join additional parties and until July 15, 2008 to amend the pleadings.

Defendant should be allowed until July 15, 2008 to join additional parties and until July 31, 2008 to amend the pleadings.

All potentially dispositive motions should be filed by November 17, 2008.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

From Plaintiff by February 13, 2009;

From Defendant by February 27, 2009.

Parties should have fourteen days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by May 2009 and at this time is expected to take approximately two days.

Respectfully submitted,

CONSTANCE COLEMAN

By: Armand L. Andry  
One of her attorneys

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Dated: June 3, 2008

Respectfully submitted,

BULGARI CORPORATION OF AMERICA

By: Asilia S. Backus  
One of its attorneys

Paul E. Bateman  
Asilia S. Backus  
LITTLER MENDELSON  
A Professional Corporation  
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Dated: June 3, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2008 a copy of the foregoing Parties' Joint Status Report was filed electronically. Notice of filing will be sent to the following parties by operation of the Court's electronic filing system. The parties may access this filing through the Court's system.

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*s/Asilia S. Backus*

Asilia S. Backus